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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**PG&E'S RESPONSE TO REQUEST
FOR ITS 2021 WILDFIRE
MITIGATION PLAN**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
2 response to the Court’s February 9, 2021 request that PG&E file its 2021 Wildfire Mitigation
3 Plan (the “2021 WMP”). (Dkt. 1298.)

4 PG&E attaches hereto as Exhibit A the 2021 WMP that it filed with the CPUC on
5 February 5, 2021 as made available to the public through PG&E’s website.¹ PG&E notes that
6 there are numerous voluminous attachments to the 2021 WMP that PG&E is not including in this
7 filing, but which PG&E would file with the Court upon request and which have also been made
8 available to the public through PG&E’s website.^{2, 3}

23 ¹ [https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural](https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2021-Wildfire-Safety-Plan.pdf)
24 [-disaster/wildfires/wildfire-mitigation-plan/2021-Wildfire-Safety-Plan.pdf](https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2021-Wildfire-Safety-Plan.pdf).

25 ² [https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural](https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2021-WMP-Attachments.zip)
26 [-disaster/wildfires/wildfire-mitigation-plan/2021-WMP-Attachments.zip](https://www.pge.com/pge_global/common/pdfs/safety/emergency-preparedness/natural-disaster/wildfires/wildfire-mitigation-plan/2021-WMP-Attachments.zip).

27 ³ The publicly available 2021 WMP filed herein and its publicly available attachments
28 contain limited redactions to protect confidential customer and employee information. PG&E
can provide unredacted copies under seal upon request.

1 Dated: February 10, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

3
4 By: /s/ Reid J. Schar
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